

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JEROME KEITH HOLMES	:	
FDBA RELIABLE AUTO SALES; DBA	:	CASE NO. 1:19-bk-04009
JKH ENTERPRISE	:	
Debtor	:	
	:	

MOTION TO DELAY CASE CLOSING

COMES NOW the Debtor, by and through Dorothy L. Mott, Esquire of Mott and Gendron Law, and moves to extend the closure of the case, respectfully stating in support thereof as follows:

1. The Debtor filed a Chapter 13 Bankruptcy Petition on September 19, 2019.
2. The Debtor has made all payments required by his plan.
3. The Debtor has not yet signed the Certification in support of discharge; however, the debtor anticipates completing the certificate within 14 days.

WHEREFORE, the Debtor requests that the case remain open for 14 days so that the certification may be completed.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott , Esquire
Attorney ID #: 43568
Mott and Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477
doriemott@aol.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JEROME KEITH HOLMES	:	
fdba Reliable Auto Sales; dba JKH	:	CASE NO. 1:19-bk-04009
Enterprise	:	
Debtor	:	
	:	

ORDER

UPON CONSIDERATION of the Motion to Extend the closure of the case, and cause appearing therefore, it is hereby

ORDERED AND DECREED that case shall remain open for at least 14 days from the date of this order so that the Debtor has the opportunity to file the required certificate.